REMARKS

Claims 1-49 and 51 are pending. Claims 1, 9, 29 and 44 have been amended to further clarify previously cited limitations included in the respective claims. Support for the amendments are included in at least paragraph [0144] of the specification. Claim 50 has been canceled. No new matter has been added. Reconsideration of the pending Claims is respectfully requested in view of the amendments to the Claims and the following remarks.

Allowed and Allowable Subject Matter

Applicant thanks the Examiner for the indication that Claims 18-28, 33, 34, 37-43, 49 and 51 are allowed.

Commonly Owned Applications

Pursuant to 37 CFR §1.56, Applicant and Applicant's attorney hereby remind the Examiner of the existence of previously cited commonly owned co-pending published patent applications some of which are related to the above-identified patent application.

Applicant respectfully requests the Examiner to review the claims and the prosecution history, including any Office Actions issued by the U.S. Patent and Trademark Office, for the following previously cited applications, since the specifications and possibly the claims include common or significantly related subject matter.

U.S. Patent Application No. 11/284,803 – Published on August 24, 2006, under Publication No. 2006/0188143 A1; and

U.S. Patent Application No. 10/519,252 – Published on May 25, 2006, under Publication No. 2006/0110026 A1.

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Response to Office Action mailed April 21, 2008
Response filed August 21, 2008

Information Disclosure Statements

In the office action mailed April 21, 2008, it was indicated that the information disclosure statements filed November 13, 2007, December 13, 2007, and January 18, 2008 were being considered by the Examiner. Applicant respectfully requests copies of the PTO-1449 forms properly initialed by the Examiner.

Claim Rejections pursuant to 35 U.S.C. §102(b) and 103(a)

Claims 1-2, 6, 44, and 46-47 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of U.S. Patent No. 5,194,969 to DiFrancesco (hereinafter "DiFrancesco") as modified by Japanese Publication No. JP102752246 to Yoshida et al (hereinafter "Yoshida"). In addition, Claims 9-13 and 16-17 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of DiFrancesco, Yoshida and US Patent Publication No. 2003/0021343 to Trovato (hereinafter "Trovato"). Also, Claims 29-32 and 36-39 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of U.S. Patent No. 6,285,373 to Baldwin et al. (hereinafter "Baldwin") as modified by US Patent Publication No. 2006/0087505 to Dumesney et al. (hereinafter "Dumesney") (NOTE: identified as Fouts in the office action). Claims 14-15 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of DiFrancesco as modified by Yoshida, Trovato and Dumesney. Claims 44 and 46-47 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of DiFrancesco as modified by Yoshida and Dumesney. Also, Claims 3-4, 7-8 and 45 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of DiFrancesco, Yoshida and U.S. Patent No. 5,471,572 to Buchner et al. (hereinafter "Buchner"). Further, Claims 5 and 48 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of DiFrancesco, Yoshida and U.S. Patent No. 5,802,361 to Wang et al. (hereinafter "Wang"). In addition, Claim 35 was rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of Baldwin, Dumesney and Wang, and Claims 40-43

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were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of Baldwin, Dumesney, Wang and design choice. Applicant respectfully traverses these rejections because the cited prior art either alone or in combination fails to teach, suggest or disclose each and every limitation of the presently pending Claims.

Claims 1-8

The method of amended Claim 1 describes creating a transformation procedure that forms the complex texture, the transformation procedure comprising a set of executable instructions to transform the source texture to form at least part of a complex texture representative of a surface of the object. Neither DiFrancesco nor Yoshida teach or suggest creation of a transformation procedure comprising a set of executable instructions to transform the source texture to form at least part of a complex texture representative of a surface of the object.

Claims 9-17

The method of Claim 9 describes storing a transformation procedure in the texture library, where the transformation procedure includes at least one of the unique identifiers and comprises a plurality of individually executable instructions to change the source texture, the transformation procedure operable to logically transform at least one of the source textures to form at least part of a complex texture when the instructions are executed. DiFrancesco and Yoshida, on the other hand, are wholly silent on any form of transformation procedure that comprises a plurality of individually executable instructions to change the source texture.

Claims 29-32 and 35-36

Amended Claim 29 describes a graphical user interface component operable to capture a plurality of transformation operations applied by a user of the computer to the source texture to transform the source texture to form at least part of a complex texture, the graphical user interface component further operable to develop and store a

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transformation procedure comprising the captured transformation operations, where the stored transformation procedure can be associated with a surface of an electronic representation of an object to provide texturization of the surface when the electronic representation is displayed by retrieval and execution of the stored transformation procedure. On page 6 of the office action it was asserted that Dumesny (identified as Fouts in the office action) disclosed such limitations. Applicant respectfully traverses this assertion since Dumesny does not teach of suggest capture of a plurality of transformation procedures or development of a transformation procedure comprising the captured transformation operations. To the contrary, the cited portions of Dumesny simply describe texture manipulation tools that allow a user to use the tools to manually modify a texture by translation, scaling and rotation without any indication of any form of capture of transformation operations, or development of a transformation procedure from the transformation operations. Moreover, Baldwin is wholly silent as acknowledged on page 6 of the office action. On page 6 of the office action, it was apparently asserted that application of Dumesny's standard texture mapping functions was equivalent to a plurality of transformation procedures. However, as described in paragraph [0005] of Dumesney, the standard mapping functions are simply fundamental surface topologies for common shapes, such as a cube, a cylinder, a sphere and a cone. Even if such standard mapping functions could be construed as equivalent to a transformation operation, Dumesney quite clearly does not teach or suggest development and storage of a transformation procedure comprising the captured transformation operations, nor retrieval and execution of said stored transformation procedure as described in Claim 29.

Claims 44-50

Claim 44 describes instructions stored in the memory device to capture and store the transformation procedure as executable instructions, and instructions stored in the memory device to access and execute the stored transformation procedure to apply the complex texture to a surface of the electronic representation when the electronic

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representation is displayed.   On page 8 of the office action, it was asserted that Dumesney disclosed these limitations. Applicant has carefully reviewed paragraphs [0014]-[0016] and [0041]-[0073] of Dumesney and is unable to identify any teaching or suggestion of instructions to capture and store a transformation procedure to form a complex texture with a source texture as executable instructions. Instead, Dumesney describes a graphical user interface that allows a user to use "direct manipulation techniques" to manually apply a texture to a 3D graphic object while receiving "real time visual feedback." (paragraph [0014] Thus, Dumesney simply provides a tool that "enables a user of a computer system to apply a texture and fine tune it until the object has the desired appearance" by use of tools that "allow users to easily and directly manipulate texture mappings applied to 3D graphic objects." (paragraph [0034] Thus, Dumesney as well as DiFrancesco, and Yoshida fail to teach or suggest the capture of any form of transformation procedure as executable instructions, and instead simply described manual activities by a user. Moreover, none of Dumesney, DiFrancesco or Yoshida teach of suggest instructions to access and execute said stored transformation procedure as also described in Claim 44.

For at least the foregoing reasons, the cited prior art does not teach or suggest each and every limitation of presently pending independent Claims 1, 9, 29, and 44 or the Claims dependent therefrom. Thus Applicant respectfully requests withdrawal of the 35 U.S.C.§103 rejections of these claims.

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In view of the amendments to the Claims and the above remarks, the application is now in condition for allowance, which is respectfully requested. Should the Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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